REMARKS

35 U.S.C. 103

Claims 1, 2, and 5-13 have been rejected under 35 U.S.C. 103(a) over Stewart et al. U. S. Patent No. 6,389,460, Sutcliffe et al. U. S. Patent 6,253,216, and Moseley, et al. "Mastering Microsoft Office 97".

Applicants' graphics server provides the ability to construct an image that is independent from the display medium of the browser. This image is constructed based on (1) the text string, which can be any text string; (2) the font selection; (3) the font color, size, effect (e.g., italics, etc.); (4) text effect to blur or shadow the text string; (5) the background color and/or image; and (6) image effect on the combination of text string and effect with the background image (e.g., button shading, rounding corners). Each of these items can vary independently.

Further, and most importantly, applicants' claims are directed to a method and system for a graphics server that generates an image that does not exist anywhere when not

found in cache.   The Examiner states:

> "...neither Sutcliffe nor Moseley disclose a cache for
> storing the graphics and text as an image.   Stewart,
> however, discloses in column 3, lines 61-67 and column
> 4, lines 1-20 an invention for storing and retrieving
> objects in a rapid and efficient manner... In Figure 2,
> Stewart illustrates a proxy cache [208] for storing
> images.   Stewart further discloses in column 16, lines
> 49-67 and column 17, lines 1-20 a hashing system for
> establishing a directory structure of cached images.
> Columns 18-20 detail the process of receiving a graphic
> request locator, hashing the request to form a string,
> locating the cached image, and serving the image to a
> browser.   Because the size of the cache is limited,
> however, it can only provide temporary storage.
> Accordingly, <u>Stewart discloses</u> in column 19, lines 62-
> 67 and column 20, lines 1-11, <u>logic for handling a</u>
> <u>request for an image not located in cache.   Stewart</u>
> <u>explains that when the image is not found, the system</u>
> <u>attempts to retrieve the image from an alternate</u>
> <u>location.</u>   In column 2, lines 39-45, Stewart provides
> motivation for adding a caching mechanism to the
> hypothetical invention of Sutcliffe and Moseley.
> Stewart explains in this section that organizations can
> more efficiently share the bandwidth of an Internet
> connection by storing frequently accessed Internet
> material.   Accordingly it would have been obvious... to
> further improve the hypothetical invention of Sutcliffe
> and Moseley by utilizing a cache as taught by Stewart.
> In the combined invention, images would be stored in a
> cache and in a database of parameters.   The invention
> would first search the cache for the desired image as
> taught by Stewart.   Then, if the requested image is not
> found in the cache, it could be reconstructed from its
> associated parameters as taught by Sutcliffe.   This
> combination would be superior to the hypothetical
> invention of Sutcliffe and Moseley because of the
> increased efficiency."   [Office Action, pages 3-4.
> Emphasis added.]

The relevant teaching of Stewart is as follows:

"The proxy cache 208 operates as a cache storage area in which repsonses to earlier requests from the Internet 106 made by the browsers 104 can be temporarily saved and satisfied thereafter from the proxy cache 208 if any of the browsers 104 make the same request for data while the data remains stored in the proxy cache 208." [Stewart, Col. 8, lines 52-57.]

"Further, when the decision 716 determines that the file does not exist or when the file wait processing 724 has determined that it does not wish to wait any longer for the state of the requested file to obtain the "DONE"state, a decision block 725 determines whether another image type is available from the proxy system (e.g., a less accelerated version or the original image). If there is another image type available, then the image retrieval processing 700 returns to repeat the decision block 718 and subsequent blocks. On the other hand, when the decision block 725 determines that there are no other image types available from the proxy system, then the image retrieval processing 700 operates to request 726 the image from the remote content server. Thereafter, once the requested image has been received, it is able to be forwarded to the requester in block 722...." [Stewart, Col. 19, line 62 to col. 20, line 8. Emphasis added.]

Stewart teaches that, in effect, if the desired image is not found in cache, it must be retrieved from some alternate location, such as proxy system or a remote content server. This teaching leads away from applicants' invention which, if the image is not found in cache, is regenerated as set forth in applicants' claims and describe in their specification:

"Referring to Figure 25 and Figure 26, graphics server 350 functions as follows. In step 380, the server receives the URL of a graphic request, such as from step 375 (Figure 24). In step 381, the URL string is hashed to obtain a hash number that, in step 382, is

used to look for an image in cache with a matching hash number. If, in step 383, that matching image is found, in step 384 the image is served in response to the request. <u>However, if that matching image is not found, the image must be regenerated. In step 385, the URL from the request is parsed to obtain the graphic parameters which, in step 386, are used to construct the graphic server objects</u>, using default parameters for any necessary parameters missing from the URL." [Specification, starting at about page 64, line 9. Emphasis added.]

In conclusion, as the Examiner states, neither Sutcliffe nor Moseley teach applicants system and method for storing the graphics and text as an image in a cache. Stewart describes storing images in a cache but, unlike applicants' claimed invention, when a desired image is not found in cache it must to some alternative location to retrieve it. Applicants, on the other hand, generate the image anew.

Stewart's teachings, therefore, when considered in combination with Sutcliffe and Moseley, teach away from a graphics server which first accesses cache for the image, and not finding the image in cache, rather than searching for the image in an alternate location, generates it anew.

Applicants have amended the independent claims to more specifically recite this distinction.

SUMMARY AND CONCLUSION

Applicants urge that the case be passed to issue with claims 1-2 and 5-13.

If, in the opinion of the Examiner, a telephone conversation with applicant(s) attorney could possibly facilitate prosecution of the case, he may be reached at the number noted below.

Sincerely,

J. Estrada, et al.

By

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Date: 6 Dec 2003

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